

# *State of Missouri*

## *Comments & Suggestions High Flow Exemption February 4, 2005*



**Missouri Department of Natural Resources**  
Water Protection and Soil Conservation Division  
Water Protection Program

February 8, 2005

**Bacteriological High Flow Exemption**  
**February 4, 2005**

**Team 1:**

- Need statewide high flow exemption
  - Upper baseline
  - “Duh test”

In conjunction with:

- Watershed site specific criteria approval by MDNR for exemption.

**Team 2:**

Yes—need a high flow exemption.

- Flow level—bank full
- Velocity—greater than 3 ft/sec.
- Kansas proposal—percentage of 2 year flood flow.
- Site-specific—bacteria management plan (long term control plan [LTCP], municipal separate storm sewer [MS4] permit, confined animal feeding operation [CAFO] waste management plan, etc.)
- Storm event DC—one-year 24-hour event.
- Risk of physical harm.

**Team 3:**

- Velocity—equal to or greater than 3 ft/sec.
- Bankfull conditions.
- Kansas Department of Health and Environment (KDHE) flow approach.
- Rainfall event (one-year, 24-hour)
- Bacteria management plan

**Team 4:**

Site-specific

- Velocity—based on potential uses.
- What is “natural” and causing impairment.

**Team 5:**

State-wide exemptions

- Velocity
- Bank full

Site-specific

- Bacteria control plan
- Permit program

Concern: Bacteria levels following rain event (availability of pools and high bacteria).